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June 17, 2019

By ECF

Honorable Vincent L. Briccetti
United States District Judge
United States District Court for the Southern
District of New York
300 Quarropas St.
White Plains, NY 10601

Re: *In re Welspun Litigation*, Case No. 16 CV 06792 (VB)

Dear Judge Briccetti:

The undersigned counsel for the Defendants in this action submit this Letter Motion to request an extension from June 17, 2019 to July 8, 2019 of each Defendant's time to file an answer with any affirmative defenses to the surviving claims in the CSAC. Plaintiffs consent to this request, as indicated in the Stipulated Agreement and [Proposed] Order that is an exhibit to this Letter Motion.

This request is being sought in light of the parties' continued discussions to resolve Plaintiffs' issues regarding the settlement in *Hansen-Mitchell, et al. v. Welspun USA Inc., et al.*, Case No. 19 L 391, currently pending in the Circuit Court of Illinois, 20th Judicial Circuit, St. Clair County, Illinois. These discussions about the *Hansen-Mitchell* action could not only resolve Plaintiffs' concerns about that action, but also obviate the need for answers to be filed in this action. This is the second request for an extension of Defendants' time to answer the CSAC; the Court previously granted Defendants' first request for extension on May 29, 2019, which was requested due to the numerous allegations in the CSAC.

Thank you for Your Honor's consideration of this matter.

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Respectfully submitted,

KIRKLAND & ELLIS LLP

By: /s/ Warren Haskel

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